

1 **LEW BRANDON, JR., ESQ.**

Nevada Bar No. 5880

2 **RYAN VENCI, ESQ.**

Nevada Bar No. 7547

3 **BRANDON | SMERBER LAW FIRM**

4 139 E. Warm Springs Road

Las Vegas, Nevada 89119

5 (702) 380-0007

(702) 380-2964 – *facsimile*

6 [l.brandon@bsnv.law](mailto:l.brandon@bsnv.law)

7 [r.venci@bsnv.law](mailto:r.venci@bsnv.law)

*Attorneys for Defendant,*

8 *ALBERTSON'S, LLC*

9 **UNITED STATES DISTRICT COURT**  
10 **DISTRICT OF NEVADA**

11 CORENE GABOT and AMIYAH GABOT,  
12 a minor by and through her Guardian ad  
13 Litem, CORENE GABOT,

14 Plaintiff(s),

15 vs.

16 ALBERTSON'S LLC, DOE Employees 1-  
17 50 and ROE Corporations 51-100, Inclusive,

18 Defendants.

CASE NO.: 2:24-cv-1943-CDS-MDC

**STIPULATION AND ORDER TO**  
**EXTEND DISCOVERY DEADLINES**  
**(FIRST REQUEST)**

19 Pursuant to Local Rules 26-3, the parties respectfully submit the following stipulation to  
20 extend the discovery deadlines in this matter by sixty (60) days.

21 **A. A Statement Specifying the Discovery Completed (LR 26-3(a)):**

- 22 1. Plaintiff have made their initial disclosures pursuant to Fed. R. Civ. P. 26(a);
- 23 2. Defendant has made its initial disclosures and one supplemental disclosure
- 24 pursuant to Fed. R. Civ. P. 26(a);
- 25 3. Defendant has served written discovery on Plaintiffs;
- 26 4. Plaintiffs have responded to written discovery;
- 27 5. Plaintiffs have served written discovery on Defendant;
- 28 6. Defendant has responded to Plaintiffs' written discovery; and

139 E. WARM SPRINGS RD.  
LAS VEGAS, NEVADA 89119  
T. 702.380.0007 | F. 702.380.2964

**BRANDON | SMERBER**  
**LAW FIRM**

6. Defendant took Plaintiff Corene Gabot's deposition on February 4, 2025.

**B. A Specific Description of the Discovery that Remains to be Completed (LR 26-3(b)):**

1. Depositions of current and former employees of Defendant;
2. Site inspection of location where the subject incident occurred;
3. The deposition of Defendant's Rule 30(b)(6) witness(es);
4. Disclosure of expert witnesses and rebuttal expert witnesses;
5. Expert and treating physician depositions.

**C. The Reasons why the Deadline was not Satisfied or the Remaining Discovery was not Completed within the Time Limits set by the Discovery Plan (LR 26-3(c)):**

In an attempt to resolve this matter, the parties have set an informal settlement conference to be conducted by Sedgwick Claims Services on behalf of Defendant. As such, the parties with the extend the discovery deadlines to avoid incurring the costs associated with taking additional depositions and retaining expert witnesses. This request is not being made for any delay or dilatory purposes. It is also being made more than twenty-one (21) days before any date the parties are requesting to be extended.

...  
...  
...  
...  
...  
...  
...  
...  
...  
...

**D. A Proposed Schedule for Completing all Remaining Discovery (LR 26-3(d)):**

	<b><u>Current Deadlines:</u></b>	<b><u>Proposed Deadline:</u></b>
Amend Pleadings:	April 16, 2025	Closed
Initial Expert Disclosure:	May 16, 2025	July 15, 2025
Rebuttal Expert Disclosure:	June 16, 2025	August 15, 2025
Discovery Cut-off:	July 15, 2025	September 12, 2025
Dispositive Motions:	August 14, 2025	October 13, 2025
Joint Pre-Trial Order:	September 15, 2025	November 12, 2025

DATED this 9<sup>th</sup> day of April 2025.

DATED this 9<sup>th</sup> day of April 2025.

**MORGAN & MORGAN**

**BRANDON SMERBER LAW FIRM**

By: /s/ Robert B. Smith, Esq.  
Robert B. Smith, Esq.  
Nevada Bar No. 9693  
18100 Von. Karman, Suite 200  
Costa Mesa, CA 92612  
*Attorneys for Plaintiffs*

By: /s/ Lew Brandon, Jr., Esq.  
Lew Brandon, Jr., Esq.  
Nevada Bar No. 5880  
Ryan Venci, Esq.  
Nevada Bar No. 7547  
139 East Warm Springs Road  
Las Vegas, NV 89119  
*Attorneys for Defendant*

**ORDER**

**IT IS SO ORDERED: If  
dispositive motions are filed, the  
deadline for filing the joint  
pretrial order will be suspended  
until 30 days after decision on  
the dispositive motions or  
further court order.**

Dated 4-11-25

UNITED STATES MAGISTRATE JUDGE  
HONORABLE MAXIMILIANO D. COUVILLIER III

